

# Exhibit B

Dean G. Yuzek

November 30, 2020

Direct Dial: (212) 907-9699  
DYuzek@ingramllp.com

**VIA ECF**

Honorable Sara L. Cave  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1670  
New York, New York 10007

**Re: *Curry v. P&G Auditors and Consultants et al.***  
**Civil Action No.: 20 Civ. 6985 (LTS) (SLC)**

Dear Magistrate Judge Cave:

Following communications among the parties, counsel for Plaintiffs and Defendants have agreed to enter into a tolling agreement regarding the running of statutes of limitation applicable to the above-referenced action, retroactive to the date the action was commenced. The tolling agreement will apply to all members of the putative collective and class. The parties' agreement is subject to Plaintiffs refraining from moving for conditional collective action certification until Defendants' answers and motions, referred to in Your Honor's Scheduling Order (ECF No. 36), have been filed in accordance with such Scheduling Order and determined by this Court; provided, however, any party may terminate the tolling agreement at any time upon prior written notice to the other parties. The parties will promptly submit a Stipulation to this effect, to be so-ordered, subject to the Court's approval.

Respectfully,

Dean G. Yuzek

DGY/md